

**REMARKS**

Reconsideration and allowance of the subject application. By this Amendment, Applicant has added new 30. Thus, claims 1-26 and 28-30 are now pending in the application. In response to the Office Action (Paper No. 17), Applicant respectfully submits that the pending claims define patentable subject matter.

Claims 1-4, 24-26, 28 and 29 are rejected under 35 U.S.C. § 102(b) as being anticipated by Markgraf et al. (EP 0 836 295 A2, hereafter "Markgraf"). Claims 6-23 are objected to as being dependent upon a rejected base claim but would be allowable if rewritten in independent form. Applicant respectfully requests the Examiner to hold in abeyance the rewriting of claims 6-23 until the Examiner has had the opportunity to reconsider the rejected parent claims in light of the arguments presented below in support of the Applicant's traverse of the rejection.

Independent claim 1 recites, in part, "an interface device (IM) coupled between a network switch (SSP) of a public intelligent network and a computer telephony integration (CTI) server means (CTS), said interface device (IM) being adapted to communicate between a service switching function device (SSF) having a service switching functionality and included within said network switch (SSP) and said CTI server means (CTS)." Independent claim 26 recites similar limitations.

Markgraf is directed to a mechanism to integrate a telephone switching system into a wide area (WAN) or local area (LAN) computer network, where in particular, a telephone switching center is controlled by a server computer utilizing a Hypertext Transfer Protocol, which is connected to a WorldWideWeb (WWW) network. In particular, a control program is

provided between a HTTP (CTI) server and the switching system which enables control of a CTI application by the HTTP server, in order to integrate the functionality of a switching network into the HTTP server. The control program provides an interface which uses a Universal Resource Locator (URL) specifying high level communicating functions which are independent of a respective interface to the switching system or the CTI server.

The Examiner (page 2 of the Office Action) contends that Figure 2 of Markgraf teaches the claimed interface device (server interface 21) coupled between a network switch (switching system 23) and CTI server means (HTTP server 22) and cites page 3, line 51 - page 4, line 17 of Markgraf in support of the rejection. However, the server interface 21 is simply an interface layer provided by the HTTP (e.g., WWW) server 22 which Markgraf teaches may be a Common Gateway Interface (CGI) which is a de facto standard interface, the Netscape Server API (NSAPI) by Netscape, or another equivalent proprietary or standard interface. Further, the server interface 21 is not directly coupled between a network switch and a CTI server means, as required by claims 1 and 26. Rather, the server interface is directly coupled between the HTTP server 22 and the control application "WebCT Processor" 20 which converts computer protocol commands into switching protocol commands (and vice versa). Further, the server interface 21 is not adapted to directly communicate between a service switching function device having a service switching functionality and included within the network switch (switching system 23) and the CTI server means (HTTP server 22), as required by claim 1.

Thus, in Figure 1 of Markgraf, the WebCT Processor 20 is the element which is most applicable to the interface device/means of the claimed invention since the WebCT Processor 20

converts computer communication protocol commands of the HTTP server means 22 into switching protocol commands of the telephone switching system 2 and vice versa. However, the WebCT Processor 20 differs from the interface device/means of the present invention in that computer communication protocol commands of the present invention are the CTI-commands such as the CSTA protocol rather than HTTP commands as in Markgraf. Further, the switching protocol commands of the present invention are CS1/CS2 commands while Markgraf associates CSTA commands with the switching type commands (see Figures 3A and 3B). Accordingly, the interface device/means of the present invention is located in a different position within the network, i.e., the claimed interface device/means is coupled between a network switch of a public intelligent network (IN) and a CTI server. On the other hand, the switch system of Markgraf (presumably a private branch exchange (PBX)) is a private network switch and, thus not part of a public intelligent network. Although Markgraf deals with integration of telephone switching in WAN or LAN computer networks, which is mainly done with PBX's but not with public network or IN switches. Further, all architectures within Markgraf refer to PBX's as the switching means rather than public switches.

In addition, independent claims 1 and 26 recite an interface with a "service switching function" which already explicitly refers to the intelligent network, whereas Markgraf refers to "switching means" or "switching protocol commands". From the description of Markgraf, the latter appear to be a private switching function commands, and thus certainly are not service switching function commands.

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Although Markgraf also relates to the integration of telephone switching systems in computer networks, at the time of the invention, SSF's were not typically integrated in computer networks. And even today, the IN telecom network and computer networks typically remain separate.

By this Amendment, Applicant has added new independent claim 30 corresponding to the subject matter recited in claims 1, 2 and 5. Applicant respectfully submits that claim 30 should be allowable for the same reasons set forth above with regards to claim 1. Further, Applicant respectfully submits that Markgraf does not teach or suggest the claimed CTI call handling device (CTICH) and mapping device (MD) of the interface device.

In view of the above, Applicant respectfully submits that independent claims 1, 26 and 30, as well as dependent claims 2-5, 14, 24, 25, 28 and 29, should be allowable because the applied reference does not teach or suggest all of the features of the claims.

Reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

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